

Denise Carlon, Esquire
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Attorneys for PNC Bank, National Association

IN THE MATTER OF:

Michael Reinhart and Susan Reinhart

DEBTORS,

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 13
CASE NO. 22-15254 RG

NOTICE OF OBJECTION

I, Denise Carlon, the undersigned, Esquire For KML Law Group, P.C., attorney for Secured Creditor PNC Bank, National Association, the holder of a Mortgage on the debtors' premises at **15 Green View Drive Pequannock, NJ 07440** hereby objects to the confirmation of the debtors' proposed Chapter 13 Plan for the following reasons:

1. The claims bar date is September 7, 2022. Secured Creditor intends to file a claim on or before the bar date with pre-petition arrears estimated at \$3,376.46.
2. Debtor's plan provides for payment in the amount of \$0.00 towards the arrearage claim of the Secured Creditor.
3. The Debtor's plan incorrectly implies that the Debtor's mortgage with the Secured Creditor is current and "unaffected by the plan". It is not. As set forth in the Proof of Claim filed by the Secured Creditor, there has been a default on the Debtor's loan. Therefore, the Secured Creditor objects to the Debtor's plan as the plan improperly classifies the Secured Creditor as current and there is no provision dealing with the Secured Creditor's claim in violation of 11 U.S.C. 1322 (a) 3; 1322 (b) and (b)5.
4. Debtor's Plan understates the amount of the Secured Creditor's claim by \$3,376.46, and does not provide sufficient funding to pay said claim.
5. Accordingly, Debtor's plan is NOT feasible, as it does not fully compensate the Secured Creditor.
6. In addition, the debtor's plan fails to comply with 11 U.S.C. 1322 and 11 U.S.C. 1325.

In the event the debtors cure the aforesaid payments due outside the Chapter 13 Plan prior to the Confirmation Hearing, the undersigned will not appear at the Confirmation Hearing and aforesaid objections should be deemed waived.

/s/Denise Carlon, Esquire

Denise Carlon, Esquire
Attorney for PNC Bank, National Association

Dated: August 18, 2022